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April 29, 2024

Re: United States v. Wang, et al., 23 Cr. 302 (PGG)

By ECF

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Dear Judge Gardephe:

We are counsel to Qingzhou Wang in the above captioned case.

I spoke with your chambers this morning about the necessity for Mr. Wang's counsel to withdraw and to ask that CJA counsel be appointed for him. Mr. Wang supports this application. I was instructed to file this letter motion and will provide a brief explanation of the need for this relief in a sealed filing, which I will email and have hand delivered to your chambers.

I conferred with AUSA Kevin Sullivan this past Friday about the need for this motion.

I am available at the Court's convenience (except May 7) to appear for this purpose.

Respectfully,



Daniel N. Arshack

/s/

Daniel Olmos

/s/

Ting Wu  
Counsel to Qingzhou Wang

CC: AUSA Alexander Nuo Li (by ECF)  
AUSA Kevin T. Sullivan (by ECF)  
Marlon G. Kirton, Esq. (by ECF)